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UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

RUSSELL L. LOW, ESQ.  
LOW & LOW, LLC  
505 Main St., Suite 304  
Hackensack, NJ 07601  
201-343-4040

In Re:

Joe L. Gregory, Jr.  
April L. Gregory

Case No.: 19-32926

Judge: SLM

Chapter: 13

### CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION

The debtor in this case opposes the following (**choose one**):

1. ☐ Motion for Relief from the Automatic Stay filed by \_\_\_\_\_ ,  
creditor,

A hearing has been scheduled for \_\_\_\_\_, at \_\_\_\_\_.

- ☐ Motion to Dismiss filed by the Chapter 13 Trustee.

A hearing has been scheduled for \_\_\_\_\_, at \_\_\_\_\_.

- ☒ Certification of Default filed by \_\_\_\_\_ the Chapter 13 Trustee \_\_\_\_\_,

I am requesting a hearing be scheduled on this matter.

2. I oppose the above matter for the following reasons (**choose one**):

- ☐ Payments have been made in the amount of \$ \_\_\_\_\_, but have not  
been accounted for. Documentation in support is attached.

☐ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

☒ Other (**explain your answer**):

September 2020 is the final month of the debtor's Trial Loan Modification. Loss mitigation has been extended to December 1, 2020 by which time we are anticipating a permanent loan modification approval to be generated by. We are respectfully requesting the opportunity to file a modified plan to lower trustee payment since our modified mortgage payment is higher and budget has changed.

3. This certification is being made in an effort to resolve the issues raised in the certification of default or motion.
4. I certify under penalty of perjury that the above is true.

Date: September 14, 2020

/s/ Joe L. Gregory, Jr.  
Debtor's Signature

Date: September 14, 2020

/s/ April L. Gregory  
Debtor's Signature

**NOTES:**

1. Under D.N.J. LBR 4001-1(b)(1), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 7 days before the date of the hearing if filed in opposition to a Motion for Relief from the Automatic Stay or Chapter 13 Trustee's Motion to Dismiss.
2. Under D.N.J. 4001-1 (b)(2), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 14 days after the filing of a Certification of Default.